

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ANGELA HYMAN,)	Case No. 3:17-cv-00089
)	
Plaintiff,)	DISTRICT JUDGE KIM R. GIBSON
)	
vs.)	
)	
BRYAN DEVLIN,)	<i>Electronically Filed</i>
)	
Defendant.)	

**DEFENDANT’S SUPPLEMENT
TO AFFIRMATIVE DEFENSES**

AND NOW, comes Defendant, BRYAN DEVLIN, by and through his attorneys, J. Eric Barchiesi, Sr. Deputy Attorney General, and Keli M. Neary, Chief Deputy Attorney General, Civil Litigation Section, and supplement his Answer and Affirmative Defenses filed in this case [ECF No. 63] by including the within Supplement to Affirmative Defenses, to-wit, a more particular statement is as follows:

FIFTEENTH DEFENSE

Defendant asserts all affirmative defenses set forth in Federal Rule 8(c), including, but not limited to accord and satisfaction, payment and release.

SIXTEENTH DEFENSE

To the extent that Plaintiff has recovered damages common to the claims asserted against the within Defendant either by settlement or by acceptance of an offer of judgment pursuant to Rule 68, Defendant avers he is entitled to a *pro tanto* set-off or reduction against any award, verdict, or judgment entered against him in this matter.

Respectfully submitted,

JOSH SHAPIRO
Attorney General

/s/ J. Eric Barchiesi
J. Eric Barchiesi, SDAG
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